



November 8, 2019

**VIA ELECTRONIC MAIL**

Brian Himmel (bhimmel@reedsmith.com)

Jeffrey Melton (jmelton@reedsmith.com)

Re: *IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION* MDL No. 2804  
PEC's Challenges to AmerisourceBergen's Privilege Claims

Dear Counselors:

This letter shall serve as the PEC's next round of sample challenges to ABDC's privilege claims. Attached to this correspondence is a spreadsheet which sets-forth our current sample challenges. As you will see, the attached spreadsheet incorporates the privilege claim information from ABDC's privilege log, and also provides some sample bases for Plaintiffs' challenges - as articulated in the far-right column on the spreadsheet. Additionally, attached is an ABDC-produced which was redacted for privilege and which we hereby challenge. We could not find this document on ABDC's privilege log, so we have included a copy of same and have listing it at the end of our spreadsheet of challenges.

Pursuant to the 10/29/2019 order governing privilege (Doc. 2882), please advise of your availability to meet and confer regarding these challenges. We will make ourselves available for the meet and confer any day (and time) next week beginning on Tuesday (11/12) after 2 pm EST. Also, if preferable, we can be available at other days/times over the following week at your convenience. We look forward to hearing from you. Thank you.

Sincerely,

/s/ Anthony Irpino

Anthony D. Irpino

ADI/bz

Attachment

cc: (via e-mail)  
Joseph Mahady  
Shannon McClure

Robert Nicholas  
Mark Pifko  
Sterling Cluff  
Scott Simmer  
Pearl Robertson